

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
No. 5:15-CV-451-BO

RAYMOND TARLTON, as Guardian Ad Litem)
for HENRY LEE MCCOLLUM; KIMBERLY)
PINCHBECK, as Limited Guardian and)
Conservator of the Estate of HENRY LEE)
MCCOLLUM; J. DUANE GILLIAM, as Guardian)
of the Estate of LEON BROWN,)

Plaintiffs,)

v.)

SPECIAL INTERROGATORIES

KENNETH SEALEY, both individually and in his)
official capacity as Sheriff of Robeson County;)
ROBERT E. PRICE, Administrator C.T.A. of the)
Estate of JOEL GARTH LOCKLEAR, SR.;)
CHARLOTTE NOEL FOX, Administrator of the)
Estate of KENNETH SNEAD; LEROY ALLEN,)

Defendants.)

With respect to Plaintiff Henry McCollum, do you find by a preponderance of the evidence that:

I. Defendants Leroy Allen and Kenneth Snead acted jointly in concert to deprive Henry McCollum of one or more of his constitutional rights?

☒ YES

☐ NO

If you answer YES to Question I, then you need not answer the *individualized* questions particular to each Defendant below, but you must still answer general Questions II-V below.

II. Defendants coerced or fabricated Henry McCollum's written confession?

☒ YES

☐ NO

If you answered YES to Question I above, you need not answer the following subsections. If you answered NO to Question I and YES to Question II, you must specify which Defendants your YES response in Question II applies to:

_____ Leroy Allen

_____ Kenneth Snead

III. Defendants suppressed material exculpatory evidence in bad faith before Henry McCollum's trials?

☒ YES

_____ NO

If you answered YES to Question I above, you need not answer the following subsections. If you answered NO to Question I and YES to Question III, you must specify which Defendants your YES response in Question III applies to:

_____ Leroy Allen

_____ Kenneth Snead

IV. Defendants suppressed material exculpatory evidence in bad faith after Henry McCollum's 1991 trial?

☒ YES

_____ NO

If you answered YES to Question I above, you need not answer the following subsections. If you answered NO to Question I and YES to Question IV, you must specify which Defendants your YES response in Question IV applies to:

_____ Leroy Allen

_____ Kenneth Snead

V. Defendants failed to investigate Roscoe Artis following Henry McCollum's arrest in bad faith?

_____ YES

☒ NO

If you answered YES to Question I above, you need not answer the following subsections. If you answered NO to Question I and YES to Question V, you must specify which Defendants your YES response in Question V applies to:

_____ Leroy Allen

_____ Kenneth Snead

With respect to Plaintiff Leon Brown, do you find by a preponderance of the evidence that:

- I. Defendants Leroy Allen and Kenneth Snead acted jointly in concert to deprive Leon Brown of one or more of his constitutional rights?**

_____ YES

☒ _____ NO

If you answer YES to Question I then you need not answer the *individualized* questions particular to each Defendant below, but you must still answer general Questions II-V below.

- II. Defendants coerced or fabricated Leon Brown's written confession?**

☒ _____ YES

_____ NO

If you answered YES to Question I above, you need not answer the following subsections. If you answered NO to Question I and YES to Question II, you must specify which Defendants your YES response in Question II applies to:

_____ Leroy Allen

☒ _____ Kenneth Snead

- III. Defendants suppressed material exculpatory evidence in bad faith before Leon Brown's trials?**

☒ _____ YES

_____ NO

If you answered YES to Question I above, you need not answer the following subsections. If you answered NO to Question I and YES to Question III, you must specify which Defendants your YES response in Question III applies to:

_____ Leroy Allen

_____ Kenneth Snead

- IV. Defendants suppressed material exculpatory evidence in bad faith after Leon Brown's 1992 trial?**

☒ _____ YES

_____ NO

If you answered YES to Question I above, you need not answer the following subsections.
If you answered NO to Question I and YES to Question IV, you must specify which Defendants your YES response in Question IV applies to:

_____ Leroy Allen

_____ Kenneth Snead

V. Defendants failed to investigate Roscoe Artis following Leon Brown's arrest in bad faith?

_____ YES

✓ _____ NO

If you answered YES to Question I above, you need not answer the following subsections.
If you answered NO to Question I and YES to Question V, you must specify which Defendants your YES response in Question V applies to:

_____ Leroy Allen

_____ Kenneth Snead

Once you have completed this form, return to the Verdict to answer Issue 2 and Issue 3.

This the 14 day of May, 2021.

REDACTED VERSION

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

Signature of the Foreperson of the Jury

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Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

Printed Name of the Foreperson of the Jury